



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 8, 2005

Andrew Tobias, Treasurer
DNC Services Corporation/Democratic National Committee
430 S. Capitol Street S.E.
Washington, DC 20003

Response Due Date:
May 9, 2005

Identification Number: C00010603

Reference: Amended 12 Day Pre General Report (10/01/04-10/13/04), received
12/06/04

Dear Mr. Tobias:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following description(s): "Events-Meetings" and "Events-Entertainment". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Your committee filed 48 hour notices informing the Commission of independent expenditures made in support or opposition of federal candidates with "Active Hubs, LLC C/O Neufeld Doudna, LLC", "AKP Message & Media", "BrandSphere", "Buying Time, LLC", "E & T Consulting Group", "Landmark Strategies, Inc.", "Message Audience & Presentation", "Mission Control Inc.", "Murphy Putnam Shorr", "National Telecommunications Services" and "United States Postmaster" as the payee(s). However, the amounts and dates of public dissemination disclosed on these notices do not appear to correlate with the entries on Schedule E, supporting Line 24 for the reporting period. If your committee has filed 48 hour notices supporting independent expenditures not reflected on your reports, you must file Schedule E during the appropriate reporting period to disclose these payments. Please amend your report to clarify this discrepancy and provide further information concerning these notices.

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-Schedule E discloses independent expenditures on behalf of a federal candidate(s). Schedule F of this report discloses coordinated expenditures on behalf of the same candidate(s). Under 2 U.S.C. §431(17), an "independent expenditure" is defined as:

... an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate; and that is not made in concert or cooperation with or at the request or suggestion of such candidate, the candidate's authorized committee, or their agents, or a political party committee or its agents.

Further, 11 CFR §109.21 outlines the factors which define a coordinated communication. Please verify that the independent expenditures made by your Committee in support of **John Kerry** meet the definition of and were properly categorized as independent expenditures. If necessary, amend your reports to disclose the aforementioned transactions as in-kind contributions (Schedule B supporting Line 23 of the Detailed Summary Page) or coordinated expenditures (Schedule F supporting Line 25 of the Detailed Summary Page).

-Please clarify all expenditures made for "Media Production", "Receptions/Venue/Ten", "Audio/Visual Charges" and "Photography" on Schedule(s) B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E or F supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

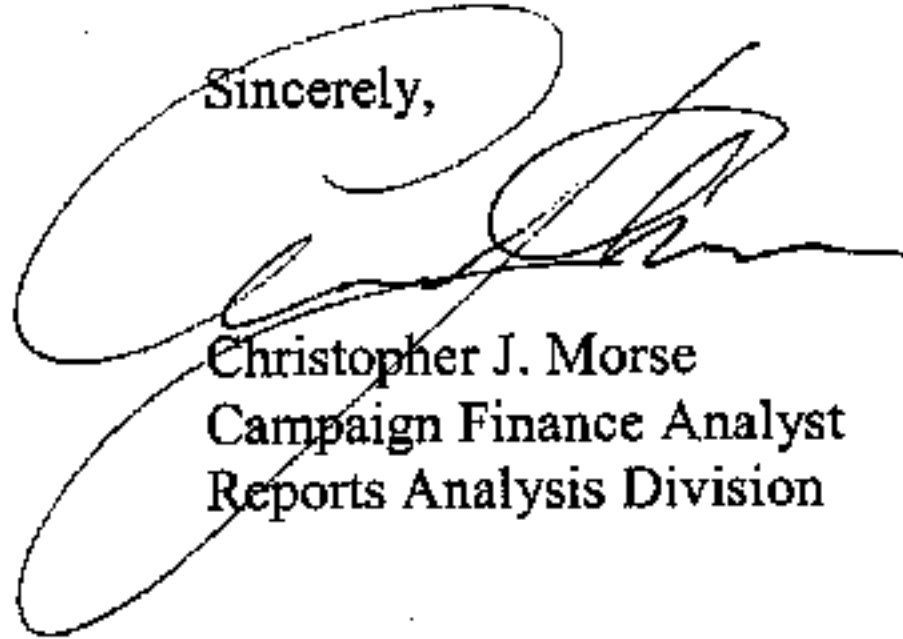
Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended.

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If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1133.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Morse", is written over the typed name and title.

Christopher J. Morse
Campaign Finance Analyst
Reports Analysis Division

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